

**RECEIVED**

AUG 12 2019

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS****THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT***Edith B. Brown, Plaintiff  
A.B.K. Investments (Morty Boatright)*

(Enter above the full name  
of the plaintiff or plaintiffs in  
this action)

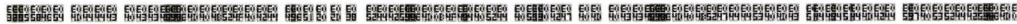
vs.

**1:19-cv-05418****Judge Andrea R. Wood****Magistrate Judge Sidney I. Schenkier***CPCA / ABR Investment  
Morty Boatright  
Selene Finance  
Beverly Mahanay  
Potestivo & Associates  
Andrew Szoka PC.*

(Enter above the full name of ALL  
defendants in this action. Do not  
use "et al.")

**CHECK ONE ONLY:**☒**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983  
U.S. Code (state, county, or municipal defendants)**☐**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE  
28 SECTION 1331 U.S. Code (federal defendants)**☐**OTHER (cite statute, if known)**

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR  
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

**I. Plaintiff(s):**

- A. Name: Edith B. Brown
- B. List all aliases: SAME
- C. Prisoner identification number: D N A
- D. Place of present confinement:
- E. Address: P.O. Box 568, OAK Park IL 60303

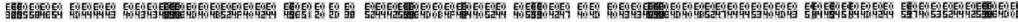
(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

**II. Defendant(s):**

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: (CPA) Capital Park Capital Advisors ABK TV
- Title:
- Place of Employment: Unknown
- B. Defendant: Beverly Mahaja
- Title: Manager of Loan
- Place of Employment: Unknown
- C. Defendant: Selene Terinial
- Title:
- Place of Employment: Unknown

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)



**III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:**

- A. Name of case and docket number: \_\_\_\_\_
- B. Approximate date of filing lawsuit: \_\_\_\_\_
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Edith B. Brown
- D. List all defendants: City of Chicago / Chicago Police Dept
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Federal
- F. Name of judge to whom case was assigned: \_\_\_\_\_
- G. Basic claim made: Violated Civil Rights
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): No
- I. Approximate date of disposition: \_\_\_\_\_

**IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.**



## "Quite Title"

### IV. Statement of Claim:

*Fraudulent Transfer of Title/deeds, AND Attempts to Evict  
a clear Violation of Civil Rights of home owner.*

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Now Comes Plaintiff, Edith B. Brown with the Complaint of <sup>1</sup> Fraudulent Transfers of Title/deeds as Assignments four on this property alone. <sup>2</sup> The fraudulent (Deed) and Misrepresentation in their assertions, that were not in accord with existing facts. Their Words/Conduct asserting the existence of facts constitute a misrepresentation if the fact does not exist. And, their fraudulent Misrepresentation was made with knowledge of its untrue character. <sup>3</sup> The clear Violation of my Civil Rights, as homeowner, only living heir of Charles W. Brown and Wife Elizabeth M. Brown, their daughter the above. <sup>4</sup> The Defendants failure to properly give notice to their loan purchaser and "Straw Person" Beverly Napaoka (Unknown to Brown family/neighbors). <sup>5</sup> Defendant Alleged C.P.A. And Sel. Inc./A.B.K. Investment, Enriched themselves through and by their Fraudulent Transfers, not only this property but others as well. Lastly, and most important the above failure to follow laws and rules of the Court and proceedings, in that "No action was taken against the holder



of the Loan Ms. Marajka, "No default, No judgment" and no attempts to produce signed C's, notes, or signed docs by either Marajka or the Browns regarding the property although repeatedly notified to do so. Their blatantly continued disregard for the court when ask to produce signed statements and proof of Marajka's purchases, their Company's President, Vice President, Treasurer and so on. As none has been provided to date. On these assignments going forward the above have placed a greater heartship on My life and that of my remaining family. I am the one true owner of the property at 5539 W Gladys Ave Chicago 60644, I have paid taxes and water for many years (2000 - ). And, I am the only living heir of the estate of Elizabeth M. Brown. As I was her guardian from 2010 - 2016 until her death. Much of what has been done by the defendant's go's to the heart of the "Big Bank's, little lawyers, fraud and felonies. I am asking this court as it is an honorable court, to accept my claim and allow me my right to a fair, just, and reputable hearing on this matter. As I pray to be heard, I believe this is an honorable judge that holds this court.

**V. Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

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VI. The plaintiff demands that the case be tried by a jury.



YES



NO

**CERTIFICATION**

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

(Signature of plaintiff or plaintiffs)

BROWN, Edith B.

(Print name)

(I.D. Number)

P.O. Box 568  
OAK PARK IL 60303

(Address)